

Knittel, Janette

From: Tasya Gray <ngray@dofnw.com>
Sent: Monday, August 10, 2020 4:56 PM
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Subject: Former Rhone Poulenc Site July Monthly Progress Report
Attachments: 20200810_Monthly Progress Report_July 2020.pdf

Hello Janette,
Please find the July monthly progress report for the Former Rhone Poulenc Site attached.
Thank you,
Tasya

Tasya Gray, LG

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August 10, 2020

Ms. Janette Knittel
EPA Region 10/AWT-150
EPA Project Coordinator
1200 Sixth Avenue, 15-D13
Seattle, WA 98101

Subject: Monthly Progress Report – July 2020
Former Rhone-Poulenc Facility
9229 East Marginal Way South
Tukwila, WA 98108

Dalton, Olmsted, & Fuglevand, Inc. (DOF) prepared this progress report on behalf of the Respondents. This report summarizes pertinent, implemented, and planned Resource Conservation and Recovery Act corrective action activities at the former Rhone-Poulenc, Inc., facility located on East Marginal Way South in Tukwila, Washington. This document is being transmitted to fulfill the monthly progress reporting requirement in the U.S. Environmental Protection Agency (EPA) Region 10 Administrative Order on Consent No. 1091-11-20-3008(h) (the Order).

ACTIVITIES COMPLETED OR IN PROGRESS FOR THIS REPORTING PERIOD

Progress Report

The June 2020 monthly progress report required under the Order was delivered to EPA on July 10, 2020.

King County Self-Monitoring Sampling and Reporting

The third quarter self-monitoring sampling will occur during the monthly site visit planned for September 1, 2020 and reporting to King County will occur in October.

Interim and Corrective Measures

This section summarizes key activities performed related to implementation of the hydraulic control interim measure (HCIM).

Performance Monitoring

No performance monitoring activities occurred during July. Semi-annual performance monitoring sampling (Round 89) and the annual specific capacity testing of the extraction wells is scheduled to occur the week of September 21, 2020 and may carry over to the following week.

Hydraulic Control

The pre-treatment system operated under automatic control from July 1 to July 31, 2020. Water level data was downloaded from both the data recorder and the programmable logic controller (PLC) on August 3, 2020.

The differential between 72-hour averaged water levels in wells DM-8 and MW-49 was maintained at more than 1-foot from July 1st to July 31st and was approximately 2.28 feet at the end of July. We will continue to report flow using the totalized flow from the individual extractions wells due to a slight undercount of flow observed when relying on the effluent flow meter, as previously reported.

Maintenance

Repair of the pre-treatment system autodialer phone line was completed by Centurylink on July 1, 2020.

Areas of deteriorated asphalt observed in June, were repaired in July 2020.

A well monument for well A2 was observed to be damaged on July 20, 2020. Cascade Drilling inspected the well and confirmed it was not damaged. The well monument was replaced on July 30, 2020.

The eastern gate to the west parcel was observed to be under construction for reconfiguration to accommodate a new tenant at the property on July 20, 2020. The new tenant on the west parcel of the Former Rhone Poulenc site is using the property as offsite parking for employees that are based out of the King County Airport across the street. A shuttle bus service will drive continuous loops from the airport to the property to transport employees back and forth. With this use in mind, the fencing around the west parcel will remain in place and be monitored for damage. A larger gate will be used on the east side of the property to allow for shuttle buses coming and going. During holidays, after shifts end, or when the time between shuttles will be greater than five minutes, the gate will be locked. As an added precaution additional fencing has been installed around the treatment building to prevent access to the groundwater pumping system equipment, and additional lighting and video surveillance are being installed.

Corrective Measures Study

The Agency Draft Corrective Measures Study (CMS) Work Plan was delivered to EPA on September 2, 2014.

The CO₂ Neutralization Pilot Study results report was submitted to EPA on May 15, 2020.

Other Activities

Sediment sampling commenced in late June within the boundaries of the Former Rhone-Poulenc RCRA Site as part of the Lower Duwamish Waterway Superfund Site Pre-Design Studies.

Activities Planned for the Next Reporting Period

Various activities associated with the facility will continue during the next reporting period. During August 2020, the Respondents plan to:

- Continue regularly scheduled operations and maintenance activities associated with the HCIM;
- Continue with EPA regarding next steps on the CMS Work Plan.

On behalf of the Respondents, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this report, Monthly Progress Report – July 2020, is true, accurate, and complete. As to those portions of the report for which I cannot personally verify accuracy, I certify under penalty of law that this report and all attachments were prepared in accordance with procedures designed to

assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who may manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By: Natasya AD Gray
Natasya Gray, Project Coordinator

Date: August 10, 2020

cc: Jennifer MacDonald, EPA

Lee Thomas, EPA

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Jeff Davis, Container Properties

Paul Linskey, Rhodia